

EXHIBIT 2

1 CAUSE NO. DC-16-12593

2 GENBAND MANAGEMENT * IN THE DISTRICT COURT

3 SERVICES CORPORATION, *

4 Plaintiff, *

5 VS. *

6 COEFFICIENT, LLC and *

7 TELEFFICIENT, LLC, *

8 Defendants/ *

9 Counter- Plaintiffs * DALLAS COUNTY, TEXAS

10 VS. *

11 GENBAND MANAGEMENT *

12 SERVICES CORPORATION, *

13 GENBAND HOLDINGS COMPANY, *

14 and GENBAND US, LLC, *

15 Counter-Defendants. * 116TH JUDICIAL DISTRICT

16 *****

17 ORAL AND VIDEOTAPED DEPOSITION OF

18 DENNIS MURRAY

19 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

20 JUNE 20TH, 2018

21 VOLUME 1

22 *****

23 ORAL AND VIDEOTAPED DEPOSITION OF DENNIS

24 MURRAY, produced as a witness at the instance of the

25 DEFENDANT/COUNTER-PLAINTIFFS, and duly sworn, was taken

in the above-styled and numbered cause on the 20th of

June, 2018, from 10:12 a.m. to 2:46 p.m., before TAMMY

1 LEA STAGGS, CSR in and for the State of Texas, reported
2 by machine shorthand, at the law offices of Baker Botts,
3 2001 Ross Avenue, Suite 1100, Dallas, Texas pursuant to
4 the Texas Rules of Civil Procedure and the provisions
5 stated on the record or attached hereto.

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A P P E A R A N C E S

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Lisa Miadzvedskaya - Summer associate

Kirstie Wallace - Summer associate

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15 REQUESTED DOCUMENTS/INFORMATION

16 (None)

17

18 CERTIFIED QUESTIONS

19 (None)

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<p style="text-align: right;">8</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: We're on the video</p> <p>3 record at 10:12 a.m. Beginning Media No. 1 of the</p> <p>4 videotaped deposition of Dennis Murray. Today's date is</p> <p>5 June 20th, 2018. If the attorneys present would please</p> <p>6 state their appearance for the record, as well as any</p> <p>7 agreements, after which the court reporter would please</p> <p>8 swear in the witness.</p> <p>9 MR. RUBENSTEIN: Jonathan Rubenstein from</p> <p>10 Baker Botts on behalf of the GENBAND entities and the</p> <p>11 witness. And with me today is Allie Smith and one of</p> <p>12 our summer associates Lisa Miadzvedskaya.</p> <p>13 MR. BEXLEY: Tyler Bexley. I represent</p> <p>14 the Defendants and Counter-Plaintiffs CoEfficient and</p> <p>15 TelEfficient.</p> <p>16 DENNIS MURRAY,</p> <p>17 Having been first duly sworn, testified as follows:</p> <p>18 EXAMINATION</p> <p>19 BY MR. BEXLEY:</p> <p>20 Q. Good morning, sir.</p> <p>21 A. Good morning.</p> <p>22 Q. Please state your full name for the record.</p> <p>23 A. Dennis Arthur Murray.</p> <p>24 Q. And what is your business address, Mr. Murray?</p> <p>25 A. 1602 Castlebar, McHenry, Illinois.</p>	<p style="text-align: right;">10</p> <p>1 A. Forty.</p> <p>2 Q. Did you review them all yesterday or some of</p> <p>3 them prior to coming in yesterday?</p> <p>4 A. Just yesterday.</p> <p>5 Q. Have you ever given a deposition before?</p> <p>6 A. No, I have not.</p> <p>7 Q. I'm sure your counsel has gone over a few of</p> <p>8 the basic rules, but I'm just going to go through some</p> <p>9 ground rules so we're on the same page. The first one</p> <p>10 is, as you can see and as I'm sure you knew, there's a</p> <p>11 court reporter taking down everything I ask and</p> <p>12 everything you answer. So you'll have to give verbal</p> <p>13 answers to everything. Not head nods and shakes. And</p> <p>14 you can't say "uh-huh" or "uh-uh" because that won't get</p> <p>15 captured by the court reporter.</p> <p>16 A. Yes.</p> <p>17 Q. Is that okay?</p> <p>18 A. Yes.</p> <p>19 Q. And, again, because she's taking everything</p> <p>20 down, even if you anticipate where I'm going with the</p> <p>21 question, I'll ask that you let me complete the full</p> <p>22 question before you answer. Minimize interruptions.</p> <p>23 And I'll extend you the same courtesy and -- and do my</p> <p>24 best not to say anything until you finish your answer.</p> <p>25 Is that okay?</p>
<p style="text-align: right;">9</p> <p>1 Q. What is your home address?</p> <p>2 A. The same.</p> <p>3 Q. Okay. Do you work out of your house?</p> <p>4 A. I do.</p> <p>5 Q. You understand you're here today to testify</p> <p>6 regarding a lawsuit between GENBAND and my clients,</p> <p>7 CoEfficient and TelEfficient?</p> <p>8 A. Yes.</p> <p>9 Q. You understand you're here under oath as if</p> <p>10 you were testifying before a jury and a court?</p> <p>11 A. Yes.</p> <p>12 Q. And you understand that what you say here</p> <p>13 today may be played or used in front of a jury in court?</p> <p>14 A. Yes, I do.</p> <p>15 Q. What did you do to prepare for your deposition</p> <p>16 today?</p> <p>17 A. Spent some time yesterday with our lawyers,</p> <p>18 Jonathan and Allie.</p> <p>19 Q. About how long did you spend with them?</p> <p>20 A. About three hours total.</p> <p>21 Q. Was that the first time you had met with them?</p> <p>22 A. Yes.</p> <p>23 Q. Did you review any documents?</p> <p>24 A. Yes.</p> <p>25 Q. Approximately how many?</p>	<p style="text-align: right;">11</p> <p>1 A. Yes.</p> <p>2 Q. And you also understand that if you need a</p> <p>3 break at any time, for any reason, just let me know and</p> <p>4 -- and you can take a break?</p> <p>5 A. Yes.</p> <p>6 Q. The only thing I ask is if there's a pending</p> <p>7 question, you answer the question before taking a break.</p> <p>8 Is that okay?</p> <p>9 A. Yes.</p> <p>10 Q. And, lastly, if I ask a question and you don't</p> <p>11 understand what I've asked, will you just let me know</p> <p>12 and I'll try to rephrase it?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. What is your current employer?</p> <p>15 A. Ribbon Communications.</p> <p>16 Q. And what is Ribbon Communications?</p> <p>17 A. A communications company. Formerly Sonus and</p> <p>18 GENBAND merged together this year to become Ribbon</p> <p>19 Communications.</p> <p>20 Q. What's your title?</p> <p>21 A. Sales leader for the AT&T account.</p> <p>22 Q. And before the merger, you were employed by</p> <p>23 GENBAND?</p> <p>24 A. Yes.</p> <p>25 Q. What was your title at GENBAND?</p>

<p style="text-align: right;">96</p> <p>1 someone at GENBAND made the decision to bring</p> <p>2 TelEfficient into the fold to provide another option to</p> <p>3 AT&T to discuss, right?</p> <p>4 A. I think I testified: I think it was around</p> <p>5 2013, yes.</p> <p>6 Q. And then about a year after that, in June</p> <p>7 2014, after TelEfficient has worked with GENBAND on some</p> <p>8 energy credits and financing information to present to</p> <p>9 GENBAND, AT&T subsequently decides to close the 1A deal</p> <p>10 with GENBAND, right?</p> <p>11 MR. RUBENSTEIN: Objection, form.</p> <p>12 A. Can you discuss the linkage you just made in</p> <p>13 that long sentence?</p> <p>14 Q. (BY MR. BEXLEY) Yeah. So after -- about a</p> <p>15 year and a half or a year and change after TelEfficient</p> <p>16 was brought into the fold -- that's the sequence, the</p> <p>17 time period when the AT&T deal for 1A closed with</p> <p>18 GENBAND, right?</p> <p>19 A. Yes.</p> <p>20 Q. Do you believe TelEfficient brought any value</p> <p>21 to GENBAND in helping to close the 1A deal with AT&T?</p> <p>22 A. Ask -- ask that again or clarify that</p> <p>23 question.</p> <p>24 Q. Do you -- do you personally believe that</p> <p>25 TelEfficient brought any value to GENBAND in helping to</p>	<p style="text-align: right;">98</p> <p>1 Q. Bessel. Nate or Nathan?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Yes?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Do you know if AT&T used any of the</p> <p>6 financial modeling or energy credit information that</p> <p>7 GEN- -- that TelEfficient presented?</p> <p>8 MR. RUBENSTEIN: Objection, form.</p> <p>9 A. Explain your question again.</p> <p>10 Q. (BY MR. BEXLEY) Yes. Do you know if AT&T</p> <p>11 used, in any way, the financial modeling and energy</p> <p>12 credit information that TelEfficient presented to AT&T?</p> <p>13 A. I know they reviewed the financial</p> <p>14 information. I don't know how they used it.</p> <p>15 Q. You've never had a discussion of whether they</p> <p>16 used it on the 1A or any other project?</p> <p>17 A. No.</p> <p>18 Q. Do you know if they applied for energy</p> <p>19 credits?</p> <p>20 A. They do every day.</p> <p>21 Q. Have you had any specific discussions around</p> <p>22 the energy credits that AT&T applied for or received in</p> <p>23 connection with the 1A deal?</p> <p>24 A. I may have, but I believe it's prior to</p> <p>25 closing the deal. I'm not sure that we've talked about</p>
<p style="text-align: right;">97</p> <p>1 close the 1A deal with AT&T?</p> <p>2 A. In helping to close the deal, no.</p> <p>3 Q. What about in helping to facilitate or</p> <p>4 continue discussions relating to the deal?</p> <p>5 A. Yes. I think that there was significant value</p> <p>6 in TelEfficient in what we could bring to AT&T for</p> <p>7 multiple programs.</p> <p>8 Q. Do you know if AT&T shared that perception?</p> <p>9 That TelEfficient brought some sort of value to the</p> <p>10 programs?</p> <p>11 A. I -- I thought at times that they did, but not</p> <p>12 certain in the end.</p> <p>13 Q. And have you ever had specific discussions</p> <p>14 with anyone at AT&T about what type of value</p> <p>15 TelEfficient may or may not bring to them?</p> <p>16 A. Probably, yes.</p> <p>17 Q. Would those have been with Mr. Watson?</p> <p>18 A. Perhaps, yes.</p> <p>19 Q. Among some of the other folks that you</p> <p>20 mentioned?</p> <p>21 A. Right. Right.</p> <p>22 Q. The Gregs? Johnson and Smith?</p> <p>23 A. Exactly, right. Yes.</p> <p>24 Q. And Polly -- is it Bessel?</p> <p>25 A. Bessel.</p>	<p style="text-align: right;">99</p> <p>1 any after.</p> <p>2 Q. Who is Felipe Gonzalez?</p> <p>3 A. AT&T.</p> <p>4 Q. He works for AT&T?</p> <p>5 A. Uh-huh.</p> <p>6 Q. He doesn't work for GENBAND?</p> <p>7 A. Oh, there's two Felipe Gonzalez.</p> <p>8 Q. Okay.</p> <p>9 A. There's one at AT&T. We also have one at --</p> <p>10 Q. Okay.</p> <p>11 A. -- at GENBAND.</p> <p>12 Q. So I'm -- I'm looking at a Felipe Gonzalez at</p> <p>13 GENBAND. What does he do for GENBAND or Ribbon now?</p> <p>14 A. I think he's sales.</p> <p>15 Q. Does he work with AT&T sales?</p> <p>16 A. Not my AT&T. But, I think, international,</p> <p>17 yes.</p> <p>18 Q. Do you recall discussing the 1A deal and</p> <p>19 TelEfficient's role in that deal with Mr. Gonzalez,</p> <p>20 ever?</p> <p>21 A. Perhaps.</p> <p>22 (Exhibit 62 marked.)</p> <p>23 Q. (BY MR. BEXLEY) I'm handing you a document</p> <p>24 I've marked as Exhibit 62. So this is an e-mail from</p> <p>25 Felipe Gonzalez to a gentleman named Sanjay Bhatia, you,</p>